

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES
PRACTICES, AND PRODUCTS
LIABILITY LITIGATION**

***THIS DOCUMENT RELATES TO
ALL CASES***

**Case No. 3:16-md-2738-MAS-RLS
MDL Case No. 2738**

**PLAINTIFFS' STEERING COMMITTEE'S MOTION TO SEAL
EXHIBIT 4 TO SUPPLEMENTAL BRIEF IN SUPPORT OF
MOTION TO QUASH OR FOR PROTECTIVE ORDER REGARDING
SUBPOENA DIRECTED AT KCIC, LLC**

Pursuant to Rule 5(d) of the Federal Rules of Civil Procedure and Local Civil Rules 5.3(c) and 7.1, Plaintiffs, by and through Plaintiffs' Steering Committee ("PSC"), hereby move to file Exhibit 4 to the Declaration of Michelle A. Parfitt, submitted in support of the PSC's Supplemental Brief in Support of Motion to Quash or for Protective Order Regarding Subpoena Directed at KCIC, LLC (ECF No. 29596) under seal.

The PSC has asserted the mediation privilege with respect to the KCIC documents at issue in the Motion to Quash and listed on the privilege log, and information on the privilege log itself constitutes privileged and confidential

attorney work product. Therefore, the PSC moves the Court for leave to submit Exhibit 4 to the Declaration of Michelle A. Parfitt under seal.

A Proposed Order is simultaneously submitted with this Motion.

Dated: March 15, 2024

Respectfully submitted,

/s/ Michelle A. Parfitt
Michelle A. Parfitt
ASHCRAFT & GEREL, LLP
1825 K Street, NW, Suite 700
Washington, DC 20006
Tel: 202-335-2600
mparfitt@ashcraftlaw.com

/s/ P. Leigh O'Dell
P. Leigh O'Dell
BEASLEY, ALLEN, CROW,
METHVIN
PORTIS & MILES, P.C.
218 Commerce St.
Montgomery, AL 36104
Tel: 334-269-2343
leigh.odell@beasleyallen.com

Plaintiffs' Co-Lead Counsel

/s/ Christopher M. Placitella
Christopher M. Placitella
COHEN, PLACITELLA & ROTH,
P.C.
127 Maple Ave.
Red Bank, NJ 07701
Tel: 732-747-9003
clplacitella@cprlaw.com

Plaintiffs' Liaison Counsel

CERTIFICATE OF SERVICE

I hereby certify that on March 15, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive services in this MDL.

Respectfully submitted,

/s/ Michelle A. Parfitt
Michelle A. Parfitt